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14 **UNITED STATES DISTRICT COURT  
15 DISTRICT OF NEVADA**

16 SHANE CROMWELL, )  
17 Plaintiff, ) Case No.: 2:24-cv-00064-NJK  
18 v. )  
19 MARTIN O'MALLEY, ) UNOPPOSED MOTION FOR VOLUNTARY  
20 Commissioner of Social Security, ) REMAND PURSUANT TO SENTENCE  
21 Defendant. ) FOUR OF 42 U.S.C. § 405(g)

22 Defendant Martin O'Malley, Commissioner of Social Security ("Defendant") respectfully  
23 requests that the Court remand this action for further administrative action pursuant to section  
24 205(g) of the Social Security Act, as amended, 42 U.S.C. section 405(g), sentence four. The  
25 purpose of the remand is to offer Plaintiff a new decision. The parties agree that no specific aspect  
26 of the Commissioner's final decision is affirmed.

On remand, the Commissioner will offer Plaintiff the opportunity for a hearing, conduct any  
necessary further proceedings and issue a new decision. Defendant further requests that the Clerk of

1 the Court be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing  
2 the final decision of the Commissioner.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
4 motion, on April 29, 2024

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6 Dated: May 3 2024.  
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8 Respectfully submitted  
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10 JASON M. FRIERSON  
11 United States Attorney  
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13  
14 */s/ Marcelo Illarmo*  
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16 Special Assistant United States Attorney  
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The Clerk's Office is  
INSTRUCTED to close this case.

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE  
DATED: May 6, 2024